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VIA EMAIL

November 22, 2005

Catherine Witherspoon
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Barry Sedlik
Business Transportation & Housing Agency
980 9th Street, Suite 2450
Sacramento, CA 95814-2719

Re: Goods Movement – Comments on Principles & Performance and Metrics Criteria

Dear Ms. Witherspoon and Mr. Sedlik:

BNSF appreciates this opportunity to propose the following three additional principles for the Goods Movement Initiative:

1. Address the assessment and reduction of diesel particulate emissions at the statewide level.
2. Ensure funding mechanisms and mitigation measures are developed and used for goods movement activities and impacts they are intended to address.
3. Improve air quality monitoring and risk assessment protocol of goods movement related emissions so as to ensure mitigation measures address related health impacts.

In addition, attached are BNSF's suggestions to streamline existing operations and proposed performance and metrics criteria for both infrastructure and mitigation measures. We appreciate being given the opportunity to participate in the Goods Movement Integrating Committee and I will be happy to answer any questions you may have. I plan to be at our meetings on November 28 and 29, 2005.

Sincerely yours,

Mary Nan Doran

MND/jbs
Attachment

**BNSF SUGGESTIONS TO STREAMLINE EXISTING OPERATIONS &
PROPOSED PERFORMANCE AND METRICS CRITERIA
FOR INFRASTRUCTURE AND MITIGATION ACTIONS**

Performance Criteria for Infrastructure and Mitigation Measures

- Increase “destination loading” on ships from the Far East to facilitate efficient TEU transfer to rail and minimize terminal or yard cargo handling;
- Clear U.S. Customs at inland destinations;
- Decrease dwell time at marine container terminals;
- Establish 24/7 Port terminal and gate operations;
- Improve communications of fluctuating demand forecast for labor and equipment among carriers, railroads and terminal operators;
- Increase efficient use of drivers, tractors and chassis pools;
- Design mitigation measures to address verified environmental and traffic impacts of goods movement;
- Design funding measures to address specific goods movement activities; and
- Implement Port-wide terminal appointment systems for truckers.

Performance Metrics for Infrastructure and Mitigation Actions

- Verify increased on-dock transfer of TEU’s to rails;
- Verify increased velocity measured by decreased dwell time for ships at port and TEU’s at terminals. For example, reducing terminal dwelling 50% doubles terminal throughput/capacity and maximizes shippers’ asset investments;
- Estimate 24/7 operations’ impacts by evaluating asset utilization and productivity associated with workers;
- Verify increased TEU throughput/acre by minimizing chassis parking, reducing congestion and truck wait time and minimizing double handling of TEU’s on and off dock;
- Verify air quality monitoring data demonstrates air quality improvements associated with infrastructure and mitigation measures, and develop a methodology for accurately fingerprinting source of particulates; and
- Verify minimization of goods movement impacts for which any expense has been incurred.